

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW
YORK,

Plaintiff

v.

NORTONLIFELOCK INC. f/k/a
SYMANTEC CORPORATION,

Defendant

Civil Action No. 3:13-cv-00808-MHL

**NORTONLIFELOCK INC.’S MOTION TO RECONSIDER
NORTON’S MOTIONS *IN LIMINE* NOS. 5 AND 6 AND FOR
AN IMMEDIATE STAY OF THE PROCEEDINGS**

Defendant NortonLifeLock Inc. f/k/a Symantec Corp. (“Norton”) respectfully requests that the Court reverse its decision finding that a conflict of interest exists as a result of Quinn Emanuel’s representation of both Dr. Marc Dacier and Norton. In the alternative, Norton requests that the Court reconsider its ruling on Norton’s Motions *in Limine* No. 5 and 6 to permit the development of a record on the conflict of interest issue. Dkt. 889. Regardless, to mitigate prejudice to Norton resulting from the MIL Opinion, Norton moves for an immediate stay of this matter until the conflict of interest issue is resolved. Norton respectfully requests expedited briefing and consideration of this Motion and proposes the following schedule:

- **March 28**—Deadline for Columbia to file its response;
- **March 31**—Deadline for Norton to file its reply; and
- **April 5**—Hearing on Norton’s motion.

Before filing this Motion and Memorandum in Support, Norton contacted Columbia as a courtesy to notify Columbia that it intended to file this Motion and to request Columbia's position on the proposed briefing schedule. Columbia promptly filed its "Emergency Notice" with the Court. Dkt. 921. After filing that Notice, counsel for Columbia responded to Norton's email, stating that Columbia was willing to meet and confer regarding Norton's motion. Given the urgency of this matter, Norton is filing this Motion and Memorandum in Support but remains willing to meet and confer regarding a briefing schedule. The grounds for this Motion are set forth in Norton's Memorandum in Support of this Motion, which is filed herewith.

DATED: March 22, 2022

NORTONLIFELOCK INC.

By /s/ Dabney J. Carr

Dabney J. Carr, IV, VSB #28679

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